

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

HONX, INC.,¹

Debtor.

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Chapter 11

Case No. 22-90035 (MI)

Re: Docket Nos. 76, 103

**CERTIFICATE OF COUNSEL WITH RESPECT TO DEBTOR’S CORRECTED
MOTION FOR ENTRY OF AN ORDER APPOINTING THE HONORABLE
BARBARA J. HOUSER, RETIRED BANKRUPTCY JUDGE FOR THE UNITED
STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS
AS LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned proposed counsel for the above-captioned debtor and debtor in possession (the “Debtor”) certifies as follows:

1. On May 9, 2022, the Debtor filed the *Debtor’s Motion for Entry of an Order Appointing the Honorable Barbara J. Houser, Retired Bankruptcy Judge for the United States Bankruptcy Court for the Northern District of Texas as Legal Representative for Future Asbestos Claimants* [Docket No. 76] (the “FCR Motion”).

2. On May 17, 2022, the Debtor filed *Debtor’s Corrected Motion for Entry of an Order Appointing the Honorable Barbara J. Houser, Retired Bankruptcy Judge for the United States Bankruptcy Court for the Northern District of Texas as Legal Representative for Future Asbestos Claimants* [Docket No. 103].²

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is HONX, Inc. (2163). The location of the Debtor’s service address in this chapter 11 case is: 1501 McKinney Street, Houston, Texas, 77010.

² The Debtor filed a corrected version of the FCR Motion to correct a non-substantive issue included on a schedule attached to the original FCR Motion.

3. The deadline for parties to respond to the the FCR Motion was May 30, 2022 (the “Response Deadline”). The Debtor provided proposed counsel to the official committee of unsecured creditors (the “UCC”) an extension of the Response Deadline to June 2, 2022.

4. Proposed counsel to the Debtor received informal comments to the proposed order authorizing the relief requested in the FCR Motion from the Office of the United States Trustee, proposed counsel to the proposed future claimants’ representative, and proposed counsel to the UCC, all of which are reflected in the revised proposed order attached hereto (the “Revised Proposed Order”). The undersigned counsel certifies that the Revised Proposed Order resolves all known objections or informal responses that the Debtor has received. A redline reflecting changes to the proposed order is also attached.

5. The Debtor requests that the United States Bankruptcy Court for the Southern District of Texas enter the attached proposed order at its earliest convenience.

Houston, TX
June 7, 2022

/s/ Veronica A. Polnick

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Certificate of Service

I certify that on June 7, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Veronica A. Polnick

Veronica A. Polnick